

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

HODELL-NATCO, INC.	)	CASE NO.: 1:08CV2755
	)	
Plaintiff,	)	
	)	JUDGE WELLS
vs.	)	
	)	<b><u>RULE 26(a) INITIAL DISCLOSURES</u></b>
SAP AMERICA, INC., et al.	)	<b><u>OF LSI-LOWERY SYSTEMS INC. AND</u></b>
	)	<b><u>IBIS GROUP</u></b>
Defendants.	)	

LSi-Lowery Systems Inc. and the former entity known as IBIS Group Inc., pursuant to Federal Rule of Civil Procedure 26(a) submits the following initial disclosures, in addition to information previously disclosed in response to discovery:

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

1. Daniel J. Lowery – President LSi-Lowery Systems Inc.; may be contacted through the undersigned counsel.
2. Cain Woodrum, LSi-Lowery Systems Inc. employee, may be contacted through the undersigned counsel.
3. John Woodrum, V.P. Business Software Support - former LSi-Lowery Systems Inc. employee, may be contacted through undersigned counsel.
4. Joe Guagenti, former LSI Systems employee, may be contacted through undersigned counsel.
5. Gary Seeker, LSI Systems
6. Avery Myrick, LSI Systems
7. Dale Van Leeuwen, IBIS, LSI Systems
8. Patricia McGrath, LSI Systems Tech.
9. Eric Johnson, LSI Systems Tech.

10. Marcia Weissman, LSI Systems Tech.
11. Ellen Daniels, Hodell-Natco employee
12. Terry Phillips, Hodell-Natco IT Project Manager.
13. Joe Viskocky, Hodell-Natco employee.
14. Otto Reidl, President of Hodell-Natco.
15. Kevin Reidl, Chief Operating Officer of Hodell-Natco.
16. Paul Killingsworth, SAP.
17. Daniel Kraus, SAP.
18. Michael Sotnick, Sr. VP, SAP.
19. Gadi Barnea, SAP
20. Edward Nevuex, SAP
21. Manfred Weis, SAP
22. Dirk Boessman, SAP
23. Geoffrey Ashley, SAP
24. Ross Elliott, Accellos/Radio Beacon

## **II. PRODUCTION OF DOCUMENTS**

The following categories of documents in the possession, custody or control of LSi-Lowery, all of which are located on LSI servers or in their offices in St. Louis, Missouri, consist of:

1. E-Mails
2. Paperwork, contracts and agreements

3. Pursuant to discussions of counsel, the following search terms for electronically stored documents are proposed as non-exclusive methods of identifying documents that may lead to the discovery of relevant documents:
- i. DI-API
  - ii. Performance
  - iii. Freeze or Freezes
  - iv. Slow
  - v. Open issue list

### **III. COMPUTATION OF DAMAGES**

Not applicable to this party

### **IV. INSURANCE AGREEMENTS**

The following policy of insurance may provide professional liability coverage applicable to some or all of the claims asserted in this action:

Philadelphia Indemnity Insurance Company  
Professional Liability Policy  
Policy No. PHSD319209  
Effective dates 4/23/2008 through 4/23/2009  
Limit of Liability: \$1,000,000.00  
Annual Aggregate: \$1,000,000.00

Respectfully submitted,

/s/ Roy A. Hulme

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Attorney for Defendants LSi-Lowery  
Systems, Inc. and The IBIS Group, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Rule 26(a) Initial Disclosures was served by regular mail and email the 22<sup>nd</sup> day of June, 2010 upon:

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/s/ Roy A. Hulme  
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